

RECEIVED

ORIGINAL  
FILE

APR 26 1991

FEDERAL COMMUNICATIONS COMMISSION  
E.W.A.R.G. OFFICE OF THE SECRETARY  
E. 22213 Henry Rd.  
Greenacres WA 99016

RECEIVED BY

APR 25 1991

MAIL BRANCH

Office of the Secretary  
Federal Communications Commission  
1919 M St. NW  
Washington DC 20554  
April 23, 1991

Re: RM 7681 ✓

Sirs:

I am writing as President of the Eastern Washington Amateur Radio Group, a group of 40 plus amateur operators in several states and three countries. We include several world-class digital operators, and operate an active PacketCluster in the Greater Spokane area, as well as a telephone Bulletin Board System. We would like to express our opposition to RM-7681.

1. There is no evidence to support the statement that the current STA allowing unattended packet operation in the HF bands has proven the necessity of continued operation. There has, as yet, been no release by the American Radio Relay League (ARRL) concerning the STA, even after repeated attempts by several amateurs to obtain this information.
2. The current debate over the accountability of System Operators running VHF and UHF packet Bulletin Board Systems (BBS) has yet to be resolved. The extension of this problem into the HF bands could have international consequences. Third-party agreements severely limit the type of communications allowed to most countries, and there is currently no adequate method of policing unattended message forwarding to accomodate the law.
3. There is a limited amount of bandspace available to amateurs in the HF spectrum. Allowing unattended packet operation in any portion would effectively eliminate that bandspace from other uses.
4. The current packet protocols are not necessarily adequate when used in the HF portions of the amateur spectrum. The conditions encountered are very different from those in the VHF and UHF bands. This can, and often does, result in HF packet being slower and less efficient in its' use of bandspace than other digital modes, especially AMTOR. Alloting substantial band segments to packet operation would not seem to be an effective use of the space.
5. While message handling and forwarding is an important part of amateur radio, it is only a small segment of a large and

growing hobby. If message handling is allotted its' own bandspace, it is to be expected that other specialized interests would request their own exclusive frequencies. The current sub-bands have been established over the course of many years, and with the input of many, many amateur operators. The current message handling system appears to be sufficient to perform its' assigned tasks. The old axiom "If it's not broken, don't fix it" seems to apply here.

Very Truly Yours,

*RP Dockrey*

R. Patrick Dockrey WQ7M  
E. 22213 Henry Rd.  
Greenacres WA 99016  
509-926-3198